

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION**

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CASE(S)
LISTED ON THE EXHIBIT ATTACHED HERETO:

JOINT MOTION TO DISMISS DEFENDANTS WITH PREJUDICE

Plaintiffs in the cases listed on the attached Exhibit A and Defendants Sofradim Production SAS,¹ Tissue Science Laboratories Limited,² Covidien LP³ (collectively the “Covidien entities”), C. R. Bard, Inc., Ethicon, Inc., and Johnson & Johnson, to the extent they are named as Defendants, advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims.

Accordingly, all parties jointly move the court to dismiss, with prejudice, and terminate from the docket of the court, the actions listed on the attached Exhibit A, with each party to bear its own costs.

¹ Sofradim Production SAS includes any incorrect or incomplete spellings of this Defendant, including Sofradim Corporation, Sofradim Corp., Sofradim Production, and Sofradim Production, SAS.

² Tissue Science Laboratories Limited includes any incorrect or incomplete spellings of this Defendant, including Tissue Sciences Laboratories, Tissue Science Laboratories Ltd., Tissue Science Laboratories, Inc., Tissue Science Laboratories, Limited and Tissue Science Laboratories, Ltd.

³ Covidien LP includes any incorrect or incomplete spellings of this Defendant, as well as any improperly named affiliates of this defendant, including Covidien Holding, Inc., Covidien Inc., Covidien Incorporated, Covidien International Finance, SA, Covidien LLC, Covidien Ltd., Covidien Trevoux, SCS, Covidien plc, Covidien, Inc., Covidien, LLC, and Covidien, PLC, Tyco Healthcare Group LP, TYCO Healthcare, Tyco Healthcare Group, L.P., Tyco International Ltd, United States Surgical Corporation, United States Surgical Corp., Floreane Medical Implants SA, Floreane Medical Implants, SA, Mareane, SA, Mareane SA, Medtronic PLC, International Technology, Inc., Medtronic MiniMed, Inc., Medtronic Puerto Rico Operations Co., Medtronic Sofamor Danek USA, Inc., Medtronic Sofamor Danek, Inc., Medtronic Sofamor Danek, USA, Inc., Medtronic USA, Inc., Medtronic, Inc. and Medtronic, Inc.

Respectfully submitted this 12th day of March, 2018.

/s/ Micah L. Hobbs

Micah L. Hobbs
mhobbs@shb.com
Devin K. Ross
dkross@shb.com
SHOOK, HARDY & BACON L.L.P.
2555 Grand Boulevard
Kansas City, MO 64108
Phone: 816.474.6550
Fax: 816.421.5547
Counsel for Covidien Entities

/s/ Richard B. North, Jr.

Richard B. North, Jr.
richard.north@nelsonmullins.com
Melissa Foster Bird
melissa.fosterbird@nelsonmullins.com
NELSON MULLINS RILEY &
SCARBOROUGH L.L.P
P.O. Box 1856
Huntington, WV 25719-1856
Phone: 304.526.3500
Fax: 304.526.3599
Counsel for C.R. Bard, Inc.

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com
Counsel for Ethicon, Inc. and Johnson & Johnson

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com
Counsel for Ethicon, Inc. and Johnson & Johnson

/s/ Robert E. Price

Robert E. Price
rprice@levinlaw.com
LEVIN PAPANTONIO THOMAS
MITCHELL
RAFFERTY & PROCTOR
Suite 600
316 South Baylen Street
Pensacola, FL32502
Phone: 850.435.7075
Fax: 850.436.6075
Attorney for Plaintiffs Listed on Exhibit A

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s/ Robert E. Price
Robert E. Price
Attorney for Plaintiffs on Exhibit A